

Anne E. Hoskins
Regulatory Counsel
(202) 589-3770



Verizon Wireless
1300 Eye Street, N.W.
Suite 400 West
Washington, D.C. 20005

Filed Electronically

September 11, 2003

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of *Ex Parte* Presentation in CC Docket No. 95-116

Dear Ms. Dortch:

On September 10, 2003, Andrea Cooper, Chris Duckett-Brown, Charles Keller and the undersigned, on behalf of Verizon Wireless, met with Eric Einhorn, Cheryl Callahan and Pam Slipakoff of the Wireline Bureau to discuss wireless local number portability.

Specifically, we discussed the rate center issue and urged the staff to prevent wireline carriers from restricting their customers' opportunities to port with wireless carriers in the same geographic areas based upon differences in the wireless and wireline network architectures and rating methods. We explained that the same LRN technology is used for LNP as has been successfully implemented by LECs for thousand block number pooling and that there are no technical impediments to wireline carriers routing calls to wireless carriers after a number has been ported from a wireline customer to a wireless carrier. We also explained that wireless LNP does not constitute "location portability" as a number will remain associated with the same original rate center after it is ported. Verizon Wireless also urged the Commission to confirm that wireless carriers need not enter into interconnection agreements with LECs in order to enable their customers to port numbers between wireline and wireless services. Such a procedural requirement would inevitably delay the opportunity for customers to port their numbers.

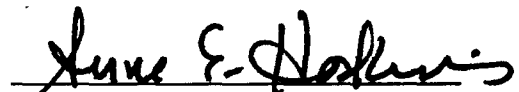
September 11, 2003

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Additionally, Verizon Wireless expressed concern to the Bureau staff with industry resistance to Verizon Wireless' bona fide requests (BFRs) for LNP. We asked the staff to share these concerns with the Enforcement Bureau and provided an example of a BFR rejection letter and a sample of the Verizon Wireless response (attached).

Please contact the undersigned with any questions.

Respectfully submitted,

A handwritten signature in black ink, reading "Anne E. Hoskins", written over a horizontal line.

Anne E. Hoskins

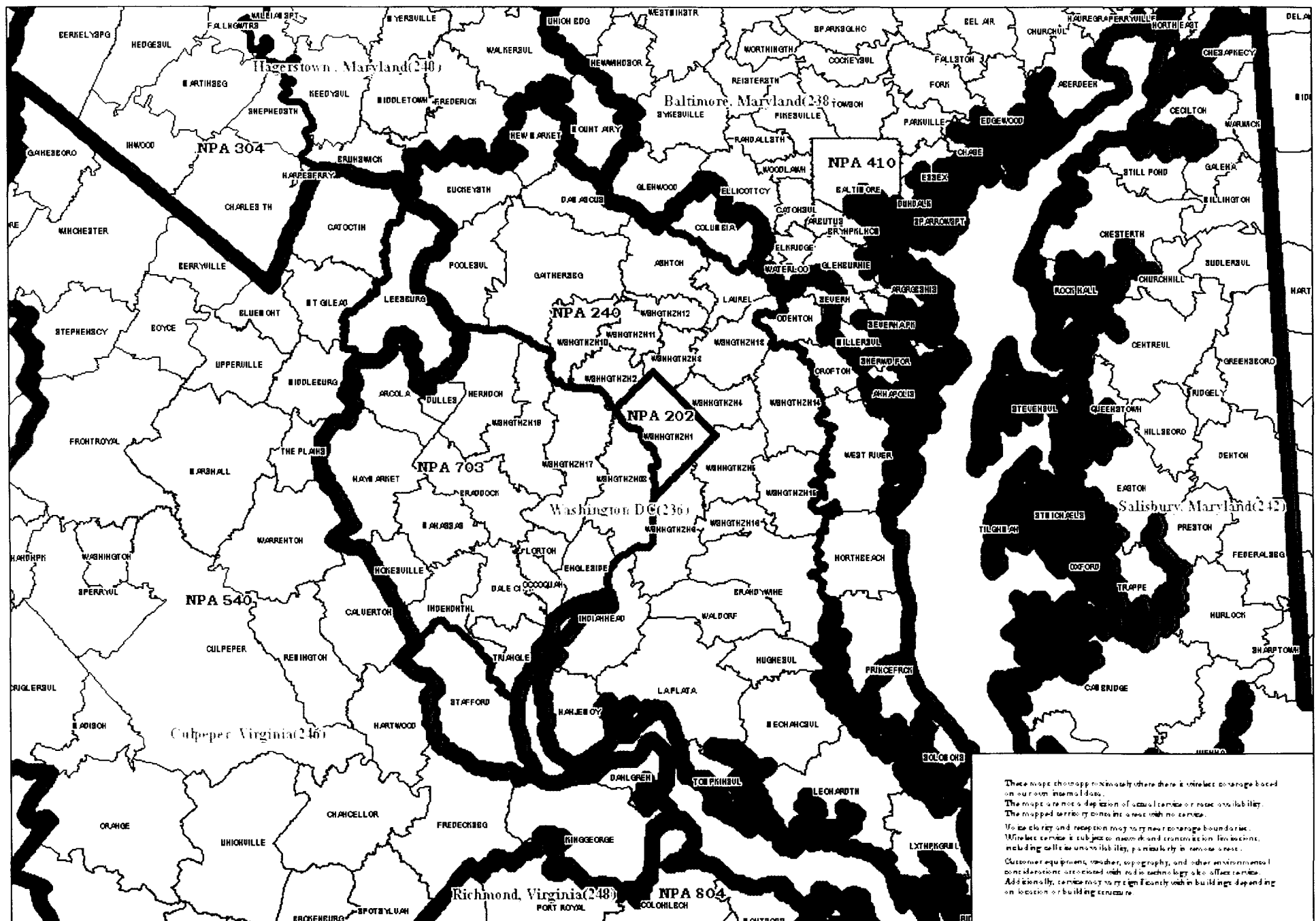
Attachments

cc: Cheryl Callahan (cover letter only)
Eric Einhorn (cover letter only)
Pam Slipakoff (cover letter only)

VERIZON WIRELESS / FCC MEETING
Inter-Modal LNP

SEPTEMBER 10, 2003

- WIRELESS CARRIERS DO NOT NEED NUMBERS IN EACH LEC RATE CENTER IN ORDER TO IMPLEMENT WIRELINE/WIRELESS PORTING
- VZW WOULD NEED TO REQUEST OVER 11 MILLION NEW NUMBERS IF REQUIRED TO ASSIGN NUMBERS IN ALL RATE CENTERS WHERE WE ARE LICENSED (assuming thousand block pooling in all rate centers)
 - VZW LICENSED TO DO BUSINESS IN 12,970 RATE CENTERS
 - VZW HAS NUMBERS IN 1,693 RATE CENTERS TODAY
- UNNECESSARY NUMBER ACQUISITION UNDERMINES THE FCC'S NUMBER CONSERVATION GOALS
 - ADDITIONAL NUMBERING REQUIREMENTS WOULD ACCELERATE NPA AND NANP EXHAUST
 - COMPARISON TO CLEC RUN ON NUMBERS IN 1990s
- LRN METHODOLOGY FACILITATES PORTING WITHOUT EXPENSIVE AND INEFFICIENT CHANGES TO CARRIER NETWORK INFRASTRUCTURE
 - CONSUMERS WILL BEAR THE COST OF EXTRA INTERCONNECTION REQUIREMENTS, ALL OF WHICH ARE UNNECESSARY TO SUPPORT LNP
- BFR PROCESS: MANY CARRIERS ARE REFUSING TO HONOR BFRs



These maps show approximate areas where there is wireless coverage based on our own internal data. The maps are not a depiction of actual service or network availability. The mapped service area is subject to change without notice. Wireless service is subject to network and construction limitations, including cell tower availability, particularly in remote areas. Customer equipment, weather, topography, and other environmental considerations associated with radio technology also affect service. Additionally, service may vary significantly with building density depending on location or building structure.

Proprietary Information of Verizon Wireless. Do not copy or disseminate without Verizon Wireless written permission.



Network Operations Support

September 5, 2003

Alhambra-Grantfolk
Alvin Wilkening
114 Wall Street PO Box 207
Alhambra, IL 62001



Verizon Wireless
Interconnection/Numbering/Mandates
2785 Mitchell Drive MS 7-1
Walnut Creek, CA 94598

Re: Bona Fide Request for Number Portability ("BFR")

Dear Alvin Wilkening,

Verizon Wireless has upgraded all of its switches for wireless number portability and plans to offer customers the ability to port in our mutual overlapping service areas, as required by the FCC's rules. Previously, Verizon Wireless mailed a bona fide request for number portability to your company, consisting of a cover letter and an attached industry-developed bona fide request form. The BFR was intended to ensure that consumers can enjoy the benefits of competitive porting among wireless and wireline carriers, where requested by a competing carrier, by November 24, 2003, or a subsequent timeframe as outlined by the FCC's rules.²

Verizon Wireless requested information designed to determine: (1) where porting is currently available; and most importantly, (2) where and when porting would be available in additional switches not currently porting capable. To this end, Verizon Wireless provided specific information regarding, among other things, the targeted rate center, NPA-NXX codes and the switch CLLI.

Verizon Wireless does not accept your response rejecting its BFR. Verizon Wireless hereby renews its original request with the same effective date triggered by that request. Specifically, Verizon Wireless rejects the following arguments offered by your company and/or other companies that the BFR must be predicated on:

- Negotiating an interconnection agreement or a traffic exchange agreement. The LNP rules do not include such a requirement. Service Provider LNP is merely a service that allows customers to retain their telephone number in the same location when switching providers and does not change existing network configurations for call rating and routing. No interconnection or traffic exchange agreement is necessary and more importantly, is not required. Verizon Wireless is willing to negotiate a service level agreement ("SLA") or other document to govern the porting activity and is in the process of contacting carriers for that purpose.
- Resolution of pending issues before the FCC regarding rate center issues, local network configurations, porting intervals, and any other remaining operational issues. Although Verizon Wireless believes that these issues will be resolved well before the November 24, 2003 deadline for wireless portability, resolution is not required for issuance of the BFR and compliance is not excused during the FCC's deliberations.

Verizon Wireless expects that you will comply with the FCC's rules and honor its BFR when customers seek to port their numbers to Verizon Wireless on or after November 24, 2003. Verizon Wireless will pursue all legal or enforcement remedies before the FCC if your company refuses to provide LNP with Verizon Wireless on or after November 24, 2003 deadline.

A handwritten signature in cursive script that reads "Bonnie Petti".

Bonnie Petti
Network Operations Headquarters Staff

cc: John T. Scott, Deputy General Counsel

² The timeframes for conversion to LNP of any additional switches are governed by the FCC's rules and range from 30 days to 180 days, depending upon the status of the switches (*i.e.*, equipped remote, hardware capable, capable switches requiring hardware, and non-capable).47 C.F.R. § 52.23 (b)(2)(iv)(A-D).



**Alhambra-Grantfork
Telephone Company**

114 Wall Street
PO Box 207
Alhambra, IL 62001
618 488 2165

June 6, 2003

Linda Godfrey
Verizon Wireless
2785 Mitchell Drive MS 7-1
Walnut Creek, CA 94598

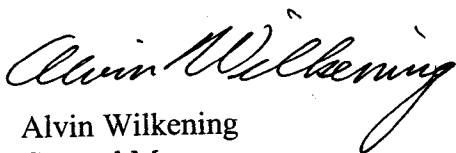
RECEIVED JUN 16 2003

Dear Ms. Godfrey

Alhambra-Grantfork Telephone Company is in receipt of your letter of May 22, 2003. In the text of the letter you state that "Verizon Wireless requires only a list of switches and NPA-NXX codes for which provisioning of LNP has not been requested." Alhambra-Grantfork has not received bona fide requests for LNP for either switch you list (GRNTILXERSO or ALHBILXEDSO) and thus has taken no action to deploy LNP.

We note that the forms attached to your letter include the term "bona fide request" on them. However since your cover letter indicates that it is a request for information only, we do not interpret your letter as a bona fide request for LNP. Should you desire to submit such a request, we will respond to such a request upon its receipt.

Sincerely,


Alvin Wilkening
General Manager

Network Operations Support



May 22, 2003

Alhambra - Grantfork Telephone Co.
114 Wall St
Alhambra, IL 62001

Verizon Wireless
Interconnection/Numbering/Mandates
2785 Mitchell Drive, MS 7-1
Walnut Creek, CA 94598

Attn: Alvin Wilkening,

Consistent with the rules of the Federal Communications Commission ("FCC"), on November 24, 2003, Verizon Wireless will begin competitive porting by offering customers local number portability ("LNP").³⁵³ The FCC sought to simplify the task of identifying the switches in each MSA in which number portability is deployed and to facilitate competitive entry.³⁵⁴ The FCC's rules require local exchange carriers to make available, upon request by any interested party, a list of their switches for which provisioning of number portability has been requested (and therefore provided) and a list of their switches for which provisioning of number portability has not been requested.³⁵⁵ Verizon Wireless requires only a list of switches and NPA-NXX codes for which provisioning of LNP has not been requested.

Verizon Wireless has simplified this request by attaching a form containing a list of switches and codes for your review. This list was derived by using the LERG and comparing it to Verizon Wireless's licensed service areas. The list identifies the switch CLLI and NPA-NXX codes that Verizon Wireless believes are not yet LNP capable. Please review and update the attached form, making any necessary changes or additions to the list regarding switches and codes that have not been marked portable. Please indicate the date by which the switch and codes will be LNP capable.³⁵⁶ Any comments can be made in the column provided on the form.

Verizon Wireless requests that you review, update and return the attached form to the undersigned contact within 10 days of receipt. Please call the undersigned with any questions or concerns.

A handwritten signature in black ink, appearing to read "Linda Godfrey".

Linda Godfrey
Verizon Wireless
Interconnection, Numbering and Mandates

925-279-6570

Enclosures

³⁵³ See 47 C.F.R. § 52.31.

³⁵⁴ Local Number Portability, *First Memorandum Opinion and order on Reconsideration*, 12 FCC Rcd. 7236, ¶¶59-66 (1997).

³⁵⁵ *Id.* at ¶64; 47 C.F.R. § 52.23(b)(2)(iii).

³⁵⁶ The timeframes for conversion to LNP of any additional switches are governed by the FCC's rules and range from 30 days to 180 days, depending upon the status of the switches (*i.e.*, equipped remote, hardware capable, capable switches requiring hardware, and non-capable). 47 C.F.R. § 52.23 (b)(2)(iv)(A-D).

Bonafide Request Form (BFR)

Purpose:

The purpose of this letter is to request the deployment of long-term Local Number Portability as defined by the FCC. Specifically, this form requests that ALL codes serving the Metropolitan Statistical Areas be opened for portability in the LERG and the NPAC and ALL switches serving these areas are LNP capable.

Note: MSAs refers to the identified U.S. Census Bureau MSAs for 2000. These may differ from the MSAs as separately defined by the wireless or wireline industries. In those instances where no MSA has been identified, please reference Rate Center to ensure switches and NPA-NXXs serving those areas are opened for porting.

TO (RECIPIENT):

If LERG contact info is incorrect, please change below.

Company Name: _____

Contact Name: _____

Contact's Address: _____

Contact's

Email: _____

Contact's Fax: _____

Contact's Phone: _____

FROM (REQUESTOR):

Company Name: Cellco Partnership d/b/a
Verizon Wireless

Contact Name: Linda Godfrey

Contact's Address: 2785 Mitchell Drive
Walnut Creek, CA 94598
Building 7-1, 7111G

Contact's Email:
Linda.Godfrey@Verizonwireless.com

Contact's Fax: 925-279-6621

Contact's Phone: 925-279-6570

Timing:

Date of Request: May 19, 2003

Receipt Confirmation
Due By: May 29, 2003 (*Due no later than 10 days after the date of the request.*)

Effective Date: November 24, 2003 or May 24, 2004 pursuant to the FCC rules

**Wireline Bonafide Request form (BFR) for Local Number Portability
Alhambra Nonportable NPA-NXXs and CLLIs**

COC TYPE	ST	RATE_CNTR	PORTABLE	NPA	NXX	Date NPA-NXX marked Portable	Comments	SOF 38-LNP	SWITCH	Date Portable	Comments
EOC	IL	GRANTFORK	N	618	675			-	GRNTILXERS0		
EOC	IL	ALHAMBRA	N	618	488			-	ALHBILXEDS0		